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March 7, 2011

Via E-Mail: rxmustic@gw.dec.state.ny.us

Richard Mustico, P.E.
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233

Re: Crouse-Hinds Landfills, Site Number 7-34-004
City of Syracuse and Town of Salina, NY

Proposed Remedial Action Plan

Dear Mr. Mustico:

I write on behalf of our client, Onondaga County, New York, and provide below the following limited comments in response to the Proposed Remedial Action Plan for the Crouse-Hinds Landfills, Site Number 7-34-004.

These comments are submitted following a review and analysis of the Proposed Remedial Action Plan (PRAP), the supporting August 5, 2009 Remedial Investigation Report and the PRAP Fact Sheet by the County and its consultants.

The County notes and takes issue with the statement in the PPAP Fact Sheet that "the data demonstrate that Ley Creek is not currently being impacted by the site."

The County is in full agreement that the data establishes that Ley Creek is impacted by upstream sources of contamination, but disputes that the data in Remedial Investigation Report establishes that there is *no current impact* to Ley Creek from the Site and more importantly, any implication that the Site had no historic impact on the Creek.

In support of this objection the County notes that prior to being used as landfills the Site consisted of low lying fields and salt marshes immediately adjacent to and in the flood plain of Ley Creek. The County

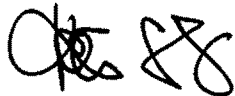
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In support of this objection the County notes that prior to being used as landfills the Site consisted of low lying fields and salt marshes immediately adjacent to and in the flood plain of Ley Creek. The County also directs the Department to page 5 of the PRAP which notes that "[s]urface water and sediments in drainage channels and wetlands at the site provide a complete pathway to aquatic organisms and their predators. Surface water runoff to Ley Creek provides a potential pathway to aquatic organisms and their predators. Groundwater seepage to surface water onsite provides a potential pathway to aquatic organisms."

While the County does not dispute and in fact, concurs that the primary source of historic and on-going contamination to Ley Creek is up gradient of this Site, the County submits the suggested "no impact" statement made in the PRAP Fact Sheet is premature and not adequately supported by either the data or the data-based conclusions in the Remedial Investigation Report.

Should you have any questions or comments, please do not hesitate to contact me or David Coburn, Director of the Onondaga County Department of the Environment directly.

Very truly yours,
The Wladis Law Firm, P.C

A handwritten signature in black ink, appearing to read 'Kevin C. Murphy', with a stylized flourish at the end.

Kevin C. Murphy

KCM/cs

Cc: David Coburn
Luis A. Mendez, Esq.